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8	UNITED STATES DISTRICT COURT	
9	DISTRICT OF NEVADA	
10		
11	CLARK COUNTY SCHOOL DISTRICT, a political subdivision of the State of Nevada,	CASE NO.: 2:13-cv-01100-JCM-PAL
12		STIPULATION AND ORDER FOR EXTENSION OF TIME FOR
13	vs.	TRAVELERS CASUALTY AND SURETY COMPANY OF AMERICA TO
14	TRAVELERS CASUALTY AND SURETY	RESPOND TO CLARK COUNTY SCHOOL DISTRICT'S TWO (2)
15	corporation,	MOTIONS FOR PARTIAL SUMMARY JUDGMENTS (Dkt. Nos. 112 and 113)
16		AND MOTION IN LIMINE (Dkt. No. 114)
17		
18	AND RELATED COUNTERCLAIM	
19		
20	Plaintiff Clark County School District ("CCSD") and Defendant Travelers Casualty and	
21	Surety Company of America ("Travelers") (collectively, "Parties"), by and through their	
22	respective counsel, stipulate and agree to a ten (10) day extension to respond to the following	
23	CCSD motions:	
24	WHEREAS:	
25	1. On October 19, 2015, CCSD filed a Motion for Partial Summary Judgment for	
26	Determination of a Major Legal Issue [that Travelers has No Claim for Delay on Each School	
27	Unless BTM Satisfied the Requirement to Give Notice of Delay Claims as they Arose] (Dkt. No.	
28	112). Travelers' response to the Motion is currently due on November 12, 2015.  9950242.1 102370.00004	

1 2. CCSD and Travelers agree that Travelers shall have up to and including November 2 23, 2015, on which to file a response to the Motion for Partial Summary Judgment for Determination of a Major Legal Issue (Dkt No. 112). 3 4 3. On October 19, 2015, CCSD filed a Motion for Partial Summary Judgment on Travelers' Wrongful Termination Counterclaim (Dkt. No. 113). Travelers' response to the 5 6 Motion is currently due on November 12, 2015. 7 4. CCSD and Travelers agree that Travelers shall have up to and including November 8 23, 2015, on which to file a response to the Motion for Partial Summary Judgment on Travelers' 9 Wrongful Termination Counterclaim (Dkt No. 113). 10 5. On October 19, 2015, CCSD filed a Motion in Limine to Preclude Travelers' from 11 Introducing Evidence on All Topics on Which Travelers' FRCP 30(b)(6) Designee was Unable to 12 Provide Answers in His Deposition (Dkt. No. 114). Travelers' response to the Motion is 13 currently due on November 5, 2015. 14 6. CCSD and Travelers agree that Travelers shall have up to and including November 15 16, 2015, on which to file a response to the Motion in Limine (Dkt No. 114). DATED this 3<sup>rd</sup> day of November, 2015. 16 17 WATT, TIEDER, HOFFAR & KOLESAR & LEATHAM FITZGERALD, L.L.P. 18 19 /s/ David R. Johnson /s/ Colby L. Balkenbush David R. Johnson, Esq. Alan J. Lefebvre, Esq. 20 Nevada Bar No. 6696 Nevada Bar No. 848 Jared M. Sechrist, Esq. Colby L. Balkenbush, Esq. 21 Nevada Bar No. 10439 Nevada Bar No. 13066 6325 South Rainbow Boulevard, Suite 110 400 South Rampart Boulevard, Suite 400 22 Las Vegas, NV 89118 Las Vegas, Nevada 89145 23 Attorneys for Attorneys for Travelers Casualty and Surety Company of Clark County School District 24 America 25 26 //// 27 ////

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**ORDER** Pursuant to the above Stipulation of the Parties, the Court hereby ORDERS that Travelers shall have up to and including November 23, 2015 to respond to CCSD's Motions for Partial Summary Judgment (Dkt Nos. 112 and 113) and shall have up to and including November 16, 2015 to respond to CCSD's Motion in Limine (Dkt. No. 114). IT IS SO ORDERED this 4th day of November, 2015. United States District Court Judge 9950242.1 102370.00004 - 3 -

1 **CERTIFICATE OF SERVICE** 2 I declare I am a citizen of the United States and employed in Clark County, Nevada. I am 3 over the age of eighteen years and not a party to the within-entitled action. On November 3, 2014, 4 I served a copy of the foregoing document: 5 STIPULATION AND ORDER FOR EXTENSION OF TIME FOR TRAVELERS CASUALTY AND SURETY COMPANY OF AMERICA TO RESPOND TO CLARK 6 COUNTY SCHOOL DISTRICT'S TWO (2) MOTIONS FOR PARTIAL SUMMARY JUDGMENTS (Dkt. Nos. 112 and 113) AND MOTION IN LIMINE (Dkt. No. 114) 7 by transmitting via facsimile the document(s) listed above to the fax number(s) set 8 forth below on this date. 9 by placing the document(s) listed above in a sealed envelope with postage thereon fully prepaid, the United States mail at Las Vegas, Nevada addressed as set forth 10 below. 11 by personally delivering the document(s) listed above to the person(s) at the 12 address(es) set forth below. 13 by transmitting via e-mail or electronic transmission the document(s) listed above × to the person(s) at the e-mail address(es) set forth in the E-Service Master List for 14 the above-entitled case. 15 Alan J. Lefebvre, Esq. 16 Colby Balkenbush, Esq. Kolesar & Leatham 17 400 South Rampart Blvd., Ste. 400 Las Vegas, NV 89145 18 Attorneys for Plaintiff 19 20 Executed on November 3, 2014. 21 /s/ Jennifer MacDonald 22 An Employee of Watt, Tieder, Hoffar & Fitzgerald, LLP 23 24 25 26 27 28 9950242.1 102370.00004 - 4 -